

To: Federal Communications Commission
From: Donald Kemp, NN8B
Subject: RM-11306

Comments,

I am opposed to the “Regulation By Bandwidth” proposal issued by the ARRL.

I do not believe this proposal will be the “savior” of amateur radio. What it will most likely do is cause many fine CW and SSB operators to simply quit.

The CW portions of the current bands are being slowly eaten up by more and more redundant digital modes. Then this new “Regulation By Bandwidth” proposal takes away even more of the already crowded CW space. Given the current resurgence of CW this will be a disaster.

The SSB portions of the current bands would be incurred upon by high bandwidth modes limiting even further the crowded SSB space.

How many new digital modes can these very limited bands handle without them pushing all the other modes into extinction? It seems a new digital mode is programmed every month. Then there’s a rush to use it, then it falls by the wayside.

In my experiences on the CW portion of the bands, the digital mode stations do NOT listen for a clear frequency before they transmit. I have had innumerable CW chats interrupted by digital transmissions.

Automatic or semi-automatic stations should be limited to a place in each band by themselves. If the law states that no one owns a frequency, how can you justify an automatic that can transmit at any second without warning?

How can you justify Pactor-III being allowed on amateur frequencies when it is a proprietary code only obtainable by buying an expensive modem that costs from \$850 to \$1500? Clearly prohibitive to most hams.

Although Pactor-III is advantageous for emergency traffic handling it is a scourge on the normal operating amateur frequencies because of its automatic nature. If the FCC allows Pactor-III for emergency communications then those organizations should be given frequencies outside the normal amateur bands to operate like the MARS groups are given.

My comments about Pactor-III would apply to any coded digital mode that is only obtainable by purchasing expensive modems that could not be adaptable to use on PC soundcards and which operate automatically.

I am an ARRL member and I believe the ARRL has asked for comments about their "Regulation By Bandwidth" proposal prior to being submitted to the FCC, however; I do not believe everyone could envision what the full impact would be, until the proposal was finalized and submitted.

I cannot support the current "Regulation By Bandwidth" proposal (RM-11306) as submitted.

Respectfully Submitted,

Donald Kemp, NN8B